

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JENNIFER HARRIS,

Plaintiffs,

vs.

FEDEX CORPORATE SERVICES, INC.,

Defendants.

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Civil Action 4:21-cv-1651

JURY DEMANDED

PLAINTIFF'S TRIAL WITNESS LIST

TO THE HONORABLE KENNETH M. HOYT:

Witnesses that Plaintiff WILL call:

Name, Address, Expected Duration, And Subject Matter of Testimony	Sworn	Admitted
<p>Jenime Black</p> <p>Ms. Black is Ms. Harris's former roommate. She may testify on the emotional, physical, and financial impact FedEx's treatment of Ms. Harris had on Ms. Harris.</p>		
<p>Rebecca Callahan</p> <p>Ms. Callahan was the District Sales Manager at FedEx and was a peer of Ms. Harris. She has knowledge of the work environment and of FedEx's policies and practices, and the policies in place at the jobsite.</p>		
<p>Rebecca Callahan</p> <p>Ms. Callahan was the District Sales Manager at FedEx and was a peer of Ms. Harris. She has knowledge of the work environment and of FedEx's policies and practices, and the policies in place at the jobsite.</p>		

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Kristie Castilow Ms. Castilow works in the human resources department at FedEx. Ms. Castilow took Mr. Wallace's position after Mr. Wallace left. She has knowledge of Ms. Harris's harassment and discrimination complaints.		
Matt Chrones Mr. Chrones is Mr. Clark's supervisor at FedEx. He has knowledge of Ms. Harris's harassment and discrimination complaints.		
Michael Clark Mr. Clark works in the human resources department at FedEx. He has knowledge of Ms. Harris's harassment and discrimination complaints.		
Brian Conrey Mr. Conrey was a District Sales Manager at FedEx and was a peer of Ms. Harris. He has knowledge of the work environment and of FedEx's policies and practices, and the policies in place at the jobsite. Mr. Conrey witnessed the harassment, discrimination, and retaliation towards Ms. Harris at FedEx.		
Brian Golden Mr. Golden is a District Sales Manager at FedEx and was a peer of Ms. Harris. He has knowledge of the work environment and of FedEx's policies and practices, and the policies in place at the jobsite.		
Richard Holley		

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Mr. Holley was the District Sales Manager at FedEx and was a peer of Ms. Harris. He has knowledge of the work environment and of FedEx's policies and practices, and the policies in place at the jobsite. Mr. Holley witnessed the harassment, discrimination, and retaliation towards Ms. Harris at FedEx.		
Thess Jolley Ms. Jolley is Ms. Harris's former roommate. She may have knowledge of the emotional, physical, and financial impact FedEx's treatment of Ms. Harris had on Ms. Harris.		
Tamara Jordan Ms. Jordan is a longtime friend of Ms. Harris. She may have knowledge of the emotional, physical, and financial impact FedEx's treatment of Ms. Harris had on Ms. Harris.		
Michelle Lamb 91 N Berryline Cir Spring, TX 77381 (248) 497-0963 Ms. Lamb was Plaintiff's Director at FedEx. She has knowledge of the work environment and the policies in place at FedEx. She harassed, discriminated, and retaliated against Ms. Harris.		
Jamie Golden McElroy Ms. McElroy is District Sales Manager at FedEx and was a peer of Ms. Harris. She has knowledge of the work environment and of FedEx's policies and practices, and the policies in place at the jobsite.		

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Casey Milner Mr. Milner is District Sales Manager at FedEx and was a peer of Ms. Harris. She has knowledge of the work environment and of FedEx's policies and practices, and the policies in place at the jobsite.		
Dan Mullally Mr. Mullally is Mr. Russell's supervisor. has knowledge of the work environment and the policies in place at FedEx. Ms. Harris reported workplace harassment and discrimination to Mr. Mullally.		
Jerry Page Mr. Page is a Director at FedEx. He was Ms. Harris's first director at FedEx. He has knowledge of the work environment and the policies in place at FedEx. He has knowledge of Ms. Harris's work performance.		
Dave Russell Mr. Russell is Ms. Lamb's supervisor at FedEx. He has knowledge of the work environment and the policies in place at FedEx. Mr. Russell was informed of the workplace harassment and discrimination to Ms. Harris.		
Coneisha Sherrod Ms. Sherrod is an expert witness in this case and will testify in accordance with her expert report regarding HR practices.		
Jon Haghayeghi, Ph.D Dr. Haghayeghi is an expert witness in this case and		

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will testify in accordance with his expert report regarding lost wages.		

Witnesses that Plaintiff MAY call:

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Chelsea Bullock Ms. Bullock is a Field Sales Representative at FedEx and was on Ms. Harris's team. She has knowledge of the work environment and of FedEx's policies and practices, and the policies in place at the jobsite. She may have knowledge of Ms. Harris's work performance.		
Doug Clavier Mr. Clavier is a Director for FedEx Freight. He has knowledge of the work environment and the policies in place at FedEx. He has knowledge of Ms. Harris's work performance.		
James Collier Mr. Collier is a Vice President at FedEx, a peer of Mr. Russell, and Mr. Mason's supervisor. He has knowledge of the work environment and the policies in place at FedEx.		
Kristi Dawson Ms. Dawson is District Sales Manager at FedEx and was a peer of Ms. Harris. She has knowledge of the work environment and of FedEx's policies and practices,		

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and the policies in place at the jobsite.		
<p>Ebony Fasoro</p> <p>Ms. Fasoro is a former FedEx employee who worked with Ms. Harris multiple times. She may testify on Ms. Harris's work performance and leadership skills. She has testify on FedEx's policies and procedures.</p>		
<p>Patrick Galvin</p> <p>Mr. Galvis is a Vice President of Inside Sales at FedEx. He overturned Ericka Toller's decision to cancel Ms. Harris's LeadUp trip. He may have knowledge of the work environment and polices at FedEx.</p>		
<p>Dulce Alexis Green</p> <p>Ms. Green is Ms. Harris's cousin. She may have knowledge of the emotional, physical, and financial impact FedEx's termination had on Ms. Harris.</p>		
<p>Gail Harris</p> <p>Ms. Harris is a current FedEx employee in the Dallas office. Ms. Harris filed a discrimination complaint against Grant Kuhn. She has knowledge of FedEx's policies and procedures and history of discrimination.</p>		
<p>Lynne Hennessey</p> <p>Ms. Hennessey is a Field Sales Account Manager on Ms. Harris's team. She may have knowledge of FedEx's work environment and policies.</p>		
<p>Brian Hickman</p> <p>Mr. Hickman is a District Sales Manager at FedEx and was a peer of Ms.. Harris. He has knowledge of the work environment and of FedEx's policies and practices, and the policies in place at the jobsite.</p>		

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<p>Joel Hitchcock</p> <p>Mr. Hitchcock is a Field Sales Representative at FedEx and was on Ms. Harris's team. He has knowledge of the work environment and of FedEx's policies and practices, and the policies in place at the jobsite.</p>		
<p>Blanche Bond-Hudson</p> <p>Ms. Hudson was the District Sales Manager at FedEx in Memphis and was a peer of Ms. Harris. She has knowledge of the work environment and of FedEx's policies and practices.</p>		
<p>Byron Jackson</p> <p>Mr. Jackson is a Field Sales Representative at FedEx and was a Ms. Harris's team. He has knowledge of the work environment and of FedEx's policies and practices, and the policies in place at the jobsite. He may have knowledge of Ms. Harris's harassment, discrimination, and retaliation.</p>		
<p>Grier Johnson</p> <p>Mr. Johnson is a Center Manager for FedEx Freight. He has knowledge of the work environment and the policies in place at FedEx. He has knowledge of Ms. Harris's work performance.</p> <p>Michael Johnson 3220 Creekside Dr Ponder, TX 76259 (214) 862-5800</p> <p>Mr. Clavier is a Manager for FedEx Express. He has knowledge of the work environment and the policies in place at FedEx. He has knowledge of Ms. Harris's work performance.</p>		

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<p>Charissa Jones</p> <p>Ms. Jones is an administrative assistant for FedEx. She has knowledge of the work environment and the policies in place at FedEx.</p>		
<p>Michael Keeler</p> <p>Mr. Keeler is a Director for FedEx Ground. He has knowledge of the work environment and the policies in place at FedEx. He has knowledge of Ms. Harris's work performance.</p>		
<p>Kristen Hunter Keith</p> <p>Ms. Keith is a District Sales Manager at FedEx. She may have knowledge of the work environment and policies at FedEx.</p>		
<p>Grant Khun</p> <p>Mr. Khun is a Director at FedEx and a peer of Ms. Lamb. He has knowledge of the work environment and the policies in place at FedEx.</p>		
<p>Kym Kyker</p> <p>Kym Kyker is a peer of Michelle Lamb. She filed a gender discrimination claim against FedEx. She has knowledge of the work environment and policies at FedEx.</p>		
<p>Brad Lambert</p> <p>Mr. Lambert was the District Sales Manager at FedEx and was a peer of Ms. Harris. He has knowledge of the work environment and of FedEx's policies and practices,</p>		

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and the policies in place at the jobsite.		
<p>Andre Lewis</p> <p>Mr. Lewis is Ms. Harris's current paster and may have knowledge of the emotional and physical impact FedEx's termination had on Ms. Harris.</p>		
<p>Jamie Mason</p> <p>Mr. Mason is a Director of the West Coast Region at FedEx and is a peer of Ms. Lamb. He has knowledge of the work environment and of FedEx's policies and practices, and the policies in place at the jobsite.</p>		
<p>Brian McCasslin</p> <p>Mr. McCasslin is a current FedEx employee. He was one of Ms. Harris's managers. He may have knowledge of Ms. Harris's work performance and leadership. He has knowledge of FedEx's policies and procedures.</p>		
<p>Cathrene Mupfumira</p> <p>Ms. Mupfumira was the District Sales Manager at FedEx and was a peer of Ms. Harris. She has knowledge of the work environment and of FedEx's policies and practices.</p>		
<p>Wilbert Perro</p> <p>Mr. Perro is a Manager for FedEx Express. He has knowledge of the work environment and the policies in place at FedEx. He has knowledge of Ms. Harris's work performance.</p>		
<p>Jim Powell</p>		

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Mr. Powell is a Director at FedEx. He was Ms. Harris's second director at FedEx. He has knowledge of the work environment and the policies in place at FedEx. He has knowledge of Ms. Harris's work performance.		
Jason Ronan Mr. Ronan is a Senior Manager for FedEx Express. He has knowledge of the work environment and the policies in place at FedEx. He has knowledge of Ms. Harris's work performance.		
Michael Skinner Mr. Clavier is a Director for FedEx Express. He has knowledge of the work environment and the policies in place at FedEx. He has knowledge of Ms. Harris's work performance.		
Melisa Stroud Ms. Stroud was Ms. Lamb's administrative assistant. She has knowledge of the work environment and of FedEx's policies and practices, and the policies in place at the jobsite.		
Zach Swartzman Mr. Swartzman is a Field Sales Representative at FedEx and was a Ms. Harris's team. He has knowledge of the work environment and of FedEx's policies and practices, and the policies in place at the jobsite. He may have knowledge of Ms. Harris's work performance.		
Michelle Smith Taylor Ms. Taylor is Ms. Harris's former manager at FedEx in the inside sales office in Dallas. She may have		

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knowledge of Ms. Harris's work performance. She may have knowledge of the work environment at policies at FedEx.		
Linda Taylor Ms. Taylor is an employee at FedEx. She participated in the investigation of Ms. Harris's complaints. She has knowledge of Ms. Harris's harassment and discrimination complaints.		
Sheritis Terriquez Ms. Terriquez was a District Sales Manager in Field at FedEx at the same time as Ms. Harris. She may have knowledge of the work environment and policies at FedEx.		
Abraham Villesa Mr. Villesa was a Market Development Account Manager at FedEx on Ms. Harris's team. He was negatively impacted by the 4G Dental account misalignment.		
Jim Wallace Mr. Wallace worked in the human resources department at FedEx. Ms. Harris reported workplace harassment and discrimination to Mr. Wallace.		
T.R. Williams Mr. Williams is Ms. Harris's former pastor. He may have knowledge of the emotional, physical, and financial impact FedEx's treatment of Ms. Harris had on Ms. Harris.		

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<p>Valerie Williams</p> <p>Ms. Williams is Ms. Harris's former pastor's wife. She may have knowledge of the emotional, physical, and financial impact FedEx's treatment of Ms. Harris had on Ms. Harris.</p>		
<p>Corey Wolfe</p> <p>Mr. Wolfe is a FedEx Field Sales/International Manager at FedEx. He may have knowledge of the facts and circumstances surrounding the events that lead to Ms. Harris's termination. He has knowledge of FedEx's practices and procedures.</p>		
<p>Miriam Zapata</p> <p>Ms. Zapata was Ms. Harris's administrative assistant. She has knowledge of the work environment and of FedEx's policies and practices, and the policies in place at the jobsite.</p>		
<p>Diane Nuar</p> <p>Ms. Nuar is Plaintiff's therapist for issues related to emotional distress from FedEx's treatment of Plaintiff.</p>		
<p>Dr. David Wolf</p> <p>Dr. Wolf treated Plaintiff while Plaintiff was located in Houston for stomach issues related to the stress from FedEx's treatment.</p>		
<p>Dr. Eric Hill</p> <p>Dr. Hill treats Plaintiff for stomach issues related to the stress from FedEx's treatment.</p>		

Plaintiff reserves the right to call any witnesses listed by Defendants. Plaintiff also reserves the right to call additional witnesses in rebuttal. Plaintiff further reserves the right to supplement this list.

Respectfully submitted,

/s/ Brian Sanford

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ATTORNEYS FOR PLAINTIFF

DEMARCUS SULLIVAN

CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2022, I electronically served the foregoing document on all counsel of record via the Court’s electronic filing system.

/s/ Brian Sanford